

# EXHIBIT G

**Kelsch, Iwona**

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**From:** O'Rourke, Michael  
**Sent:** Wednesday, January 15, 2025 12:25 PM  
**To:** Steve Schulte  
**Cc:** Darren McDowell; Drew Bias; SJ NEC MDL; MDL3026PLC@dicellolevitt.com; MJC-Enfamil@cov.com; Nancy Hinojosa; Witte, Jamie  
**Subject:** RE: Correspondence in Walker v. Mead Johnson & Company, et al (23-cv-000783) (MDL 3026)

Steve,

I am writing to follow up on the below. Please either provide Mead Johnson with medical records, including a pincite indicating where in the records a Mead Johnson product is identified, or dismiss the claims against Mead Johnson from the above-captioned litigation on or before January 21. If you are unable to do so, Mead Johnson intends to request relief from the Court pursuant to CMO 12.

Best,

**Michael Andrew O'Rourke**  
Associate

**Step toe**

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**From:** Steve Schulte <schulte@ntrial.com>  
**Sent:** Wednesday, December 18, 2024 3:37 PM  
**To:** O'Rourke, Michael <morourke@step toe.com>  
**Cc:** Darren McDowell <dmcowell@ntrial.com>; Drew Bias <dbias@ntrial.com>; SJ NEC MDL <sjnecmdl@Step toe.com>; MDL3026PLC@dicellolevitt.com; MJC-Enfamil@cov.com; Nancy Hinojosa <nhinojosa@ntrial.com>  
**Subject:** [EXTERNAL] Re: Correspondence in Walker v. Mead Johnson & Company, et al (23-cv-000783) (MDL 3026)

Michael, Darren is no longer with our firm and I'm out of the country. Happy to look at this the week after Christmas and touch base then if that is acceptable to you.

Sent from my iPhone

On Dec 17, 2024, at 1:24 PM, O'Rourke, Michael <[morourke@step toe.com](mailto:morourke@step toe.com)> wrote:

This message originated from outside your organization

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Counsel,

The Complaint and Plaintiff Profile Form in the above-referenced matter do not specifically allege that the infant received a Mead Johnson product, nor has Plaintiff produced any medical records showing that a Mead Johnson product was fed to the infant in this case, as required by Case Management Order No. 12 (CMO 12), Section III.A.3. All cases that fail to demonstrate that Mead Johnson supplied the healthcare facility with the type of preterm infant nutrition administered to the infant must either “(a) dismiss or (b) amend the operative Complaint to dismiss Mead Johnson” within 120 days after the entry of the Order. CMO 12, III.C.6.a. CMO 12 was entered more than 120 days ago on May 6, 2024.

Accordingly, we ask that you immediately produce medical records identifying the Mead Johnson product fed to this infant or dismiss Mead Johnson. If you fail to do so by December 24, we intend to file a motion to show cause, as contemplated by CMO 12. III.C.6.B.

Thank you,

**Michael Andrew O'Rourke**  
Associate

**Steptoe**

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